

EXHIBIT 38

(Supplement)

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SERGEY LEONTIEV,

Plaintiff,

Case No. 16-cv-3595

-against-

ALEXANDER VARSHAVSKY,

Defendant.

January 11, 2017

3:10 p.m.

Videotaped deposition of
ALEXANDER SHCHEGLYAEV, taken by Defendant,
pursuant to Notice, held at Hotel Kämp,
Pohjoisesplanadi 29, Helsinki, Finland,
before Sharon Lengel, a Registered
Professional Reporter, Certified Realtime
Reporter, and Notary Public of the State
of New York.

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2 A P P E A R A N C E S:

3

4 GIBSON, DUNN & CRUTCHER LLP
5 Attorneys for Plaintiff
6 200 Park Avenue
7 New York, New York 10166
8 BY: MARSHALL KING, ESQ.
9 ANDREI MALIKOV, ESQ.

10

11

12 DEBEVOISE & PLIMPTON LLP
13 Attorneys for Defendant
14 801 Pennsylvania Avenue, N.W.
15 Washington, D.C. 20004
16 BY: NICHOLAS C. TOMPKINS, ESQ.
17 COLBY A. SMITH, ESQ.

18

19

20 ALSO PRESENT:

21 DAVID ROSS ELLIOTT, Videographer
22 PAVEL KHOKHLACHEV, Interpreter
23 VICTOR POTAPOV, Check Interpreter
24 VITALIY POPOV, ESQ.

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* * *

1 SHCHEGLYAEV

2 to the companies of which you are the
3 beneficiary?

4 A. I'm just trying to remember,
5 just to explain the pause.

6 I don't think so. But I might
7 be mistaken.

8 Q. Do you know someone named Irina
9 Zubiy?

10 A. Yes.

11 Q. How do you know her?

12 A. About the same way as I know
13 Ms. Vyulkova. There were some corporate
14 events, some birthdays. For a certain
15 period of time, she tried to deal with
16 those companies, but I didn't quite
17 understand what came out of it.

18 Q. When you say, "For a period of
19 time, she tried to deal with those
20 companies," can you describe for us what
21 she did?

22 A. From the unconfirmed information
23 that I have, she contacted Trident
24 herself. And the emails that came from
25 Trident, that is, after February 2016, she